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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,) No. CR 06-0090-MHP
Plaintiff,)
v.)
HARUT KORAKOSSIAN,) STIPULATION AND [PROPOSED]
a/k/a Harry Korakossian,) ORDER TO CONTINUE STATUS
a/k/a Harut Korakissian,) HEARING AND EXCLUDE TIME
a/k/a Harry Korakissian,) UNDER THE SPEEDY TRIAL ACT
a/k/a Harutyun Kirakossian,) FROM APRIL 17, 2006 TO MAY 15, 2006
WILSON FUNG,)
EDWARD RIDGELL, and)
DAISY TORRES CRUZ,)
Defendants.)

STIPULATION

1. On April 17, 2006, Harut Korakossian appeared before the Court for his first appearance in district court in the Northern District of California before the Honorable Marilyn Hall Patel. The parties requested a continuance to May 15, 2006, in order to allow (1) the government to

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produce discovery to the defendants (upon receipt of a Rule 16 discovery request); and (2) to allow defense counsel adequate time to review discovery and prepare for trial.

2. Co-defendant's Ridgell and Fung had a previously scheduled status hearing set for April 24, 2006 at 10:00 a.m. before the Honorable Marilyn Hall Patel. Counsel for Ridgell, Assistant Federal Public Defender Geoff Hansen appeared and agreed to continue that status hearing to May 15, 2006 and to continue to exclude time under the Speedy Trial Act to allow defense counsel adequate time to prepare for trial.

3. Ellen Barry, counsel for Fung, was not present for the hearing on April 17, 2006, but was informed of the proposed continuation of the case and the exclusion of time under the Speedy Trial Act immediately after the hearing. Ms. Barry agreed to this continuance and exclusion of time on behalf of her client.

4. The Court excused all three of the defendants from appearing on May 15, 2006.

5. Both counsel and defendants stipulate and agree that time should be excluded from April 17, 2006 through and including May 15, 2006 from the Speedy Trial Act under 18 U.S.C. §§ 3161(h)(8)(A) and (B)(iv) in order to allow a reasonable amount of time for the defense to effectively prepare for trial, taking into account the exercise of due diligence.

SO STIPULATED.

DATED: 5/8/06

GEOFF HANSEN /s/
Attorney for Defendant A. RIDGELL

DATED: 4/24/06

ELLEN BARRY /s/
Attorney for Defendant FUNG

DATED: 4/21/06

/s/
ARTHUR K. WACHTEL
Attorney for Defendant KORAKOSSIAN

DATED: 5/9/06

CANDACE KELLY
Assistant United States Attorney
/s/

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3 The Court finds that there is good cause for the extension of time described above, and
4 that the ends of justice served by granting this continuance outweigh the best interests of the
5 public and of the defendants in a speedy trial and the prompt disposition of criminal cases. 18
6 U.S.C. § 3161(h)(8)(A). The Court further finds that failure to grant the continuance would deny
7 the defendants and their counsel the reasonable time necessary for effective preparation taking
8 into account the exercise of due diligence and continuity of counsel under 18 U.S.C. §
9 3161(h)(8)(B)(iv).

10 Accordingly, and with the consent of the defendants, the Court continues the matter to May
11 15, 2006, for a status hearing before the Honorable Judge Patel at 10:00. The Court further
12 orders that the period from April 17, 2006 through and including May 15, 2006 be excluded from
13 the Speedy Trial Act calculations under 18 U.S.C. § 3161(h)(8)(A) and (B)(iv).

14 IT IS SO ORDERED.

15 DATED: May 11, 2006



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